

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

## **NOTICE OF MOTION FOR ENTRY OF AN ORDER**

**(I) APPROVING DISCLOSURE STATEMENT; (II) APPROVING SOLICITATION PACKAGES AND DISTRIBUTION PROCEDURES; (III) APPROVING THE FORMS OF BALLOTS AND ESTABLISHING PROCEDURES FOR VOTING ON JOINT PLAN; (IV) APPROVING THE FORM, MANNER, AND SCOPE OF CONFIRMATION NOTICES; (V) ESTABLISHING CERTAIN DEADLINES IN CONNECTION WITH APPROVAL OF THE DISCLOSURE STATEMENT AND CONFIRMATION OF THE JOINT PLAN; AND (VI) GRANTING RELATED RELIEF**

**PLEASE TAKE NOTICE THAT** on December 6, 2023, The Roman Catholic Diocese of Syracuse, New York (the “Diocese”), filed the *Disclosure Statement in Support of Joint Chapter 11 Plan of Reorganization for The Roman Catholic Diocese of Syracuse, New York dated December 6, 2023* [Docket No. 1566] (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the “Disclosure Statement”) and the *Joint Chapter 11 Plan of Reorganization for The Roman Catholic Diocese of Syracuse, New York dated December 6, 2023* [Docket No. 1565] (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the “Joint Plan”).

**PLEASE TAKE NOTICE**, that on January 16, 2024, the Diocese, by and through its undersigned counsel, moved the United States Bankruptcy Court for the Northern District of New York (the “Court”) for entry of an order (i) approving the Disclosure Statement; (ii) approving solicitation packages and distribution procedures; (iii) approving the forms of ballots and establishing procedures for voting on the Joint Plan; (iv) approving the form, manner, and scope of confirmation notices; (v) establishing certain deadlines in connection with approval of the Disclosure Statement and confirmation of the Joint Plan; and (vi) granting related relief (the “Disclosure Statement Motion”).

**PLEASE TAKE FURTHER NOTICE**, that a hearing to consider the Disclosure Statement Motion and any objections related thereto will be held on **February 6, 2024 at 12:00 p.m. (prevailing Eastern time)**, or as soon thereafter as counsel may appear and be heard, before the Honorable Wendy A. Kinsella, Chief United States Bankruptcy Judge for the Northern District of New York, or such other judge as may be sitting in her stead in the James M. Hanley U.S. Courthouse and Federal Building, 100 South Clinton Street, Syracuse, NY 13261.

**PLEASE TAKE FURTHER NOTICE**, that parties may appear at the Hearing in person at the United States Bankruptcy Court for the Northern District of New York, James M. Hanley U.S. Courthouse and Federal Building, 100 South Clinton Street, Syracuse, New York 13216, OR by telephone via call-in number: 888-398-2342; and access code: 3187406#.

**PLEASE TAKE FURTHER NOTICE**, that responses in opposition to the relief requested in the Disclosure Statement Motion, if any, must be electronically filed with the Court and served upon (i) counsel to the Diocese, Bond, Schoeneck & King, PLLC, One Lincoln Center, Syracuse, NY 13202, Attn: Stephen A. Donato, Charles J. Sullivan, and Grayson T. Walter, (ii) the Office of the United States Trustee for the Northern District of New York, 10 Broad Street, Room 105, Utica, NY 13501, Attn: Joseph W. Allen and Erin Champion, (iii) counsel to the Official Committee of Unsecured Creditors, Stinson LLP, Attn. Robert T. Kugler & Edwin H. Caldie, 50 South Sixth Street, Suite 2600, Minneapolis, MN 55402, and (iv) those persons who have formally appeared and requested service in this case pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure.

**PLEASE TAKE FURTHER NOTICE**, that a copy of the Disclosure Statement Motion, the Disclosure Statement and the Joint Plan may be obtained from the Clerk's Office, United States Bankruptcy Court for the Northern District of New York, Syracuse Division, via the Court's electronic case management system at <https://ecf.nynb.uscourts.gov>, by visiting <https://case.stretto.com/dioceseofsyracuse/docket>, by calling 855.329.4244, or by written request to the Diocese's undersigned counsel.

Dated: January 16, 2024

BOND, SCHOENECK & KING, PLLC

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*The Roman Catholic Diocese  
of Syracuse, New York*